



January 6, 2023

Via ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Best Brands Consumer Products Inc. v. PHSA, LLC*
Case No. 22-cv-803

Dear Judge Abrams:

We represent Best Brands Consumer Products Inc. (“Best Brands”) in the above matter. On November 6, 2022, we wrote to inform the Court that the parties have reached a settlement in principle in this matter. Dkt. 23. Accordingly, we respectfully requested that this matter be stayed for 30 days while the parties worked out the details of the settlement agreement. In view thereof, on November 7, 2022, the Court Ordered that the action be discontinued, and that the parties had 30 days to restore the action to the Court’s docket. Dkt. 24. On December 6, we again requested a further 30 days to allow the parties to finalize the settlement agreement, Dkt. 25, and the Court granted our request. Dkt. 26. In that Order, the Court stated that “No further extensions will be granted absent good cause shown.” *Id.*

Although the parties were cognizant of the Court’s Order and have again worked diligently to finalize the settlement agreement, they have yet to finalize the document. The holiday season and associated vacations, and the number of parties involved, along with the cumbersome nature of requiring various in-house and outside counsel to review each draft of the settlement agreement has caused unfortunate delay. With that being said, the parties believe that they are extremely close to finalizing the settlement agreement.

As such, we respectfully request a short extension (i.e., until January 30, 2023) of the stay to ensure that the settlement agreement is finalized, and to avoid the need to prematurely restore the action to the Court’s docket

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Lee A. Goldberg

Lee A. Goldberg

cc: Counsel of PHSA (via ECF)